

Remarks

Claims 1-2 and 4-20 remain in this application. Claim 3 was previously canceled without prejudice.

Claim Rejections--35 USC 103

Claims 1, 5, 7-10 and 16 stand rejected under 35 U.S.C. § 103 as being unpatentable over Park (US 2002/0085554) in view of Navada et al. (US 2003/0214956), Musoll et al. (US 7,155,516), and Ambe et al. (US 2002/0196796), and Zhang (US 6,845,094). (hereinafter referred to as "Park," "Navada," "Musoll," "Ambe," and "Zhang," respectively)

Similarly, the remaining claims 2, 4, 6, 11-15, and 17-20 stand rejected based on Park, Navada, Musoll, Ambe, and Zhang in combination with one or more other references.

Applicants respectfully traverse the above rejections.

Previously-presented claim 1 recites as follows.

1. A method of processing a data packet by **a networking switch**, the method comprising:
 - receiving the data packet at a network device;
 - determining whether a **multiple-key decision cache** is hit by the data packet;
 - applying at least one cached action if the decision cache is hit;
 - processing the data packet using software routines if the decision cache is missed;
 - determining whether action performed by the software routines is programmable into the multiple-key decision cache;** and
 - programming a new entry into the multiple-key decision cache if the action performed is programmable,wherein **the new entry indexes into the multiple-key decision cache, and programming the new entry does not involve storing the data packet, and**

wherein **said cached action comprises network address translation of the data packet.**

(Emphases added.)

As stated in the latest office action, "Park does not teach a networking switch, 'multiple-key', determining whether an action by software is programmable into cache, and a new entry indexes into a cache, and programming a new entry does not involve storing a packet, and a cached action comprises network address translation of a data packet." (Office action, page 4, lines 4-7.) In other words, the office action admits that a total of **six elements** of claim 1 are absent from Park. The six elements being: (i) "a networking switch"; (ii) "a multiple-key decision cache"; (iii) "determining whether an action performed by software is programmable into the multiple-key decision cache"; (iv) that "the new entry indexes into the multiple-key decision cache"; (v) that "programming a new entry does not involve storing the data packet"; and (vi) that "said cached action comprises network address translation of the data packet."

As discussed below, applicants respectfully submit that at least the third element ("determining whether an action performed by software is programmable into the multiple-key decision cache") and the sixth element ("said cached action comprises network address translation of the data packet") are not disclosed or suggested by the cited art.

**A. THE CITED ART DOES NOT DISCLOSE OR SUGGEST
"DETERMINING WHETHER AN ACTION PERFORMED BY SOFTWARE IS
PROGRAMMABLE INTO THE MULTIPLE-KEY DECISION CACHE"**

The office action asserts that "relinquishing packets incompatible with the LPM to a second storage system" per Musoll is substantively the same as "determining whether an action performed by software is programmable into the multiple-key decision cache." Applicants respectfully traverse this assertion.

As stated in Musoll, LPM means "local packet memory" and is used by the "first storage system" while the "second storage system" uses "external packet memory." Hence, Musoll merely discloses **packets** that are **storable** into either a first or a second **memory**. In contrast, this claim element recites "determining

whether an **action** performed by software is **programmable** into the multiple-key decision **cache**."

Applicants respectfully submit that programming an action into a cache is entirely different in function, way, and result from storing a packet into a memory. First, programming is distinct from storing. Second, an action is distinct from a packet. Third, a cache is distinct from a memory.

B. THE CITED ART DOES NOT DISCLOSE OR SUGGEST "SAID CACHED ACTION COMPRISES NETWORK ADDRESS TRANSLATION OF THE DATA PACKET"

The office action asserts that NAT information being "network address translation between a dynamic IP address space and a permanent IP address space using stored network address translation (NAT) information, and where NAT information comprises a cache of mobility information generally including a plurality of cache entries, and where NAT information is stored and managed in a distributed cache" per columns 6-7 of Zhang is substantively the same as "said cached action comprises network address translation of the data packet." Applicants respectfully traverse this assertion.

This citation to Zhang merely discloses a cache for storing NAT information. In contrast, claim 1 teaches a cache for programming actions (including the act of network address translation).

Applicants respectfully submit that programming an action into a cache is entirely different in function, way, and result from storing information in a cache.

Therefore, the Park, Navada, Musoll, Ambe, and Zhang references, independently or in combination, do not describe, teach, or suggest each and every element and limitation provided in applicants' independent claim 1. Nor is there any hint of how these references could be combined to accomplish what applicants are trying to do in the instant application. Accordingly, applicants respectfully request reconsideration and withdrawal of the § 103 rejection of claim 1, as well as those claims which depend therefrom.

Claims 2 and 4-15 depend from claim 1. Therefore, applicants respectfully submit that claims 2 and 4-15 overcome their rejections for at least the reasons discussed above in relation to claim 1.

Claim 16 is an independent apparatus claim and recites logic configured to perform steps similar to those discussed above in relation to claim 1. Therefore, applicants respectfully submit that claim 16 overcomes its rejection for at least the reasons discussed above in relation to claim 1.

Claim 17 depends from claim 16. Therefore, applicants respectfully submit that claim 17 overcomes its rejection for at least the reasons discussed above in relation to claim 16.

Claim 18 is an independent method claim and recites elements similar to those discussed above in relation to claim 1. Therefore, applicants respectfully submit that claim 18 overcomes its rejection for at least the reasons discussed above in relation to claim 1.

Claims 19-20 depend from claim 18. Therefore, applicants respectfully submit that claims 19-20 overcome their rejections for at least the reasons discussed above in relation to claim 18.

Conclusion

For the above-discussed reasons, applicants respectfully submit that the rejections of the office action are overcome. Favorable action is respectfully requested.

If there are any questions regarding the above, the Examiner is invited to call the below-referenced attorney to discuss this case.

Respectfully Submitted,

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